

## Exhibit A

# Complaint and Proof of Service

1 **COMP**2 **Shaun Rose Law LLC**

3 Shaun M. Rose, Esq.

4 Nevada Bar #13945

5 9505 Hillwood Dr., Suite 100

6 Las Vegas, Nevada 89134

7 Phone: (702) 570-3838

8 Email: [shaun@shaunroselaw.com](mailto:shaun@shaunroselaw.com)

9 Attorney for Plaintiff

10 CASE NO: A-21-840960-C

11 Department 13

12 **DISTRICT COURT**13 **CLARK COUNTY, NEVADA**

14 DONALD WILLIAMS,

15 Plaintiffs,

16 vs.

17 SECURE SOURCE INTERNATIONAL, LLC;  
18 DOES I through X, inclusive; and ROE  
19 CORPORATIONS I through X, inclusive,

20 Defendant.

21 CASE NO.:  
DEPT. NO.:22 **COMPLAINT**23 COMES NOW Plaintiff, Mr. Donald Williams (herein "Plaintiff" or "Mr. Williams"), by  
24 and through his attorney, Shaun M. Rose, Esq. of SHAUN ROSE LAW LLC, and, for his causes  
25 of action against Defendant, complains and alleges as follows:26 **JURISDICTION AND VENUE**

1. The events giving rise to this Complaint occurred in Clark County, Nevada.  
2. Jurisdiction is proper pursuant to NRS 14.065 and venue is proper pursuant to NRS 13.010.
2. The Court has subject matter jurisdiction over this matter pursuant to NRS 4.370, as  
the matter in controversy exceeds \$15,000.00, exclusive of attorney's fees, interest, and costs.

27 **PARTIES**

28 3. Plaintiff, is and was at all relevant times, a resident and citizen of the State of Nevada,  
29 in Clark County, Nevada.

30 4. Defendant, Secure Source International, LLC (herein "Defendant"), is and was at all  
31 relevant times, a Foreign Limited Liability Company and resident and citizen of the State of  
32

Arizona but that does regular and systematic business within Clark County, Nevada.

5. DOES I through X and ROE CORPORATIONS I through X, inclusive, are other parties or entities which are liable to Plaintiff for the damages complained of herein, whose names will be supplied specifically in these proceedings when they are discovered and determined to be proper parties to this action by Plaintiff and Plaintiff will seek leave of the Court to amend her Complaint when the identity of these Defendants is determined. Plaintiff is informed and believes that DOES I through X and ROE CORPORATIONS I through X, inclusive, are responsible in some manner for the events and occurrences herein alleged, and that Plaintiff's damages were and are directly and proximately caused by the conduct, acts and omissions of said Defendants.

## **GENERAL ALLEGATIONS**

6. Plaintiff began employment for Defendant as a security guard on January 12, 2018.

7. As defined by NRS 648.016, Plaintiff worked in the position of security guard, as his duties required him to work as a watchman or guard of private property.

8. Plaintiff was not licensed by the Nevada Private Investigators Licensing Board (herein “PILB”), so on or about August 15, 2020, Plaintiff put forth an application for a “card guard” to obtain the proper licensing.

9. Pursuant to NRS 648.016, a person working as a security guard in Nevada requires licensing by the PILB.

10. In Nevada, if a company permits its employees to work as a security guard without proper licensing, then the employer company can face fines and other adverse administrative actions by the PILB pursuant to NRS 648.165.

11. Plaintiff obtained a hearing regarding his request for a security guard license in front of the PILB on September 2, 2020, and during the hearing, Plaintiff caused the reporting that Defendant did not have proper licensing for its security guard operations or for its security guard employees working in Nevada.

1                   **I. CAUSE OF ACTION: TORTIOUS DISCHARGE FOR REPORTING**

2                   **UNLAWFUL ACTIVITY**

3                   12. Plaintiff repeats and realleges each and every foregoing paragraph as set forth above  
4 and incorporates the same by reference as though fully set forth at length herein.

5                   13. On September 2, 2020, Plaintiff did cause for the reporting to an outside  
6 governmental agency, in this case, the PILB, the unlawful conduct by his employer, the  
7 Defendant.

8                   14. Plaintiff reasonably and in good faith believed the Defendant had engaged in the  
9 unlawful conduct and the reporting thereof was not out of malice or ill intent, but rather, Plaintiff  
10 merely wanted to make sure that his employment and work as a security guard fully complied  
11 with Nevada law, as Plaintiff enjoyed the work and wanted to continue to work as such  
12 indefinitely.

13                  15. Defendant knew Plaintiff had made the report to the PILB because Defendant's  
14 manager, Michelle Alfaro, told Plaintiff that his name was on the fine that Defendant received  
15 from the PILB for not having proper licensing of its security guards operations.

16                  16. The Defendant discharged Plaintiff from his employment on December 14, 2020  
17 because of Plaintiff's reporting of Defendant's unlawful conduct.

18                  17. Plaintiff consistently earned very good performance ratings, with almost all reviews  
19 of 4.8 out of 5 during the course of his employment, so any allegation by Defendant that Plaintiff  
20 was terminated due to performance or any wrongful conduct on his part is a pretext.

21                  18. As a proximate result of Defendant's tortious discharge, Plaintiff has suffered lost  
22 wages, emotional distress, lost opportunities of advancement, and lost employment related  
23 benefits.

24                   **PRAYER FOR RELIEF**

25                  WHEREFORE, Plaintiff, hereby request judgment as follows:

26                  1. General and special damages in an amount in excess of \$15,000;

- 1           2. Pre-Judgment and Post-Judgment Interest;  
2           3. For costs and attorneys' fees; and  
3           4. All such further relief as the Court deems necessary, proper and just.

4           DATED this 13th day of September, 2021.

5           Respectfully submitted,

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7           Shaun M. Rose, Esq.  
8           9505 Hillwood Dr., Suite 100  
9           Las Vegas, Nevada 89134  
9           *Attorney for Plaintiff*

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DISTRICT COURT  
CLARK COUNTY, NEVADA

DONALD WILLIAMS  
Plaintiff

vs

SECURE SOURCE INTERNATIONAL, LLC  
Defendant

Case Number: A-21-840960-C

Dept:

**PROOF OF SERVICE**

SABRINA ROSE, deposes and says: that at all times herein I am a citizen of the United States, over 18 years of age, licensed to serve civil process in the State of Nevada under license #389, and not a party to nor interested in the proceeding in which this statement is made.

Legal Wings, Inc. received on Tuesday, September 14, 2021 a copy of the:

**SUMMONS; COMPLAINT**

I served the same on **9/14/2021 at 5:32 PM** to:

**Defendant SECURE SOURCE INTERNATIONAL, LLC, BY SERVING MARC GOHRES,  
REGISTERED AGNT**

by leaving the copies with or in the presence of **MARC GOHRES** at **10409 PACIFIC PALISADES AVE, LAS VEGAS, NV 89144**.

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Wednesday, September 15, 2021



SABRINA ROSE

Registered Work Card R-2020-00191